

1 Jules F. Bonjour, State Bar No. 38980  
2 BONJOUR, THORMAN, BARAY & BILLINGSLEY  
3 24301 Southland Dr., Suite 312  
4 Hayward, CA 94545  
5 Tel: (510) 785-8400  
6 Fax: (510) 670-0955  
7 jules@btbandb.com

FILED SOO/AR/EC/H

8 Attorneys for defendant Raquel Ramirez

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN JOSE DIVISION

12 UNITED STATES OF AMERICA,

No.: CR 12-00465 DLJ

13 Plaintiff,

14 STIPULATION AND ~~[PROPOSED]~~  
15 ORDER TO CONTINUE  
16 HEARING DATE FROM MARCH  
17 21, 2013 TO APRIL 18, 2013; AND  
18 REQUEST TO TRAVEL

19 vs.

20 RAQUEL RAMIREZ, et.al.,

Date: March 21, 2013

Time: 9:00 a.m.

21 Defendant.

Court: Hon. D. Lowell Jensen

22 The above-referenced matter is set for status hearing before this Court on March 21, 2013  
23 at 9:00 a.m. The parties jointly request that the matter be continued from March 21, 2013 to  
24 April 18, 2013. The reason for the continuance is that the parties are close to reaching an  
25 agreement on a plea and need some additional time to finalize it. The parties further request that  
26 the Court exclude time under the Speedy Trial Act between March 21, 2013 and April 18, 2013  
27 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

28 In addition Ms. Ramirez is requesting that she be allowed to leave the Northern District  
and travel to AnaMaria Island, Florida from April 6, 2013 to April 13, 2013 for a family reunion.

1 Neither the government nor pretrial services, who have been contacted, have an objection to this  
2 request.

3 IT IS SO STIPULATED.  
4

5 Dated: March 11, 2013

/s/  
Jules F. Bonjour  
Attorney for Raquel Ramirez

8 Dated: March 11, 2013

/s/  
Dan Kaleba, AUSA  
Attorney for the United States

11  
12 ~~[PROPOSED]~~ ORDER

13 Pursuant to stipulation of the parties and GOOD CAUSE APPEARING,

14 IT IS HEREBY ORDERED that the hearing in this matter is continued from March 21,  
15 2013 to April 18, 2013 at 2:00 p.m. before this Court, and that time between March 21, 2013 and  
16 April 18, 2013 is excluded under the Speedy Trial Act. It is FURTHER ORDERED that the  
17 defendant be allowed to travel to AnaMaria Island, Florida from April 6, 2013 to April 13, 2013.

18 IT IS SO ORDERED.  
19

20  
21 Dated: HBJ/H

  
HON. D. LOWELL JENSEN  
United States District Judge